

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LYNNE FREEMAN, an individual,

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, an individual, EMILY SYLVAN KIM, an individual, PROSPECT AGENCY, LLC, a New Jersey limited liability company, ENTANGLED PUBLISHING, LLC, a Delaware limited liability company, HOLTZBRINCK PUBLISHERS, LLC D/B/A MACMILLAN, a New York limited liability company, UNIVERSAL CITY STUDIOS, LLC, a Delaware limited liability company, and CRAZY MAPLE STUDIO, INC., a California Corporation,

Defendants.

Case No. 1:22-cv-02435-LLS-SN

**PLAINTIFFS'S LYNNE FREEMAN'S FIRST SET
OF REQUESTS TO ADMIT TO DEFENDANTS
TRACY DEEBS-ELKENANEY P/K/A TRACY
WOLFF AND ENTANGLED PUBLISHING, LLC**

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure ("Federal Rules"), Plaintiff Lynne Freeman requests that Defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff and Entangled Publishing, LLC (collectively, "Defendants"), respond to this First Set of Requests to Admit (each, a "Request," and together, the "Requests") by serving written responses thereto at the offices of CSReeder, P.C.11766 Wilshire Blvd., Suite 1470, Los Angeles, CA, 90025, within thirty (30) days of service hereof.

These Requests shall be read and interpreted in accordance with the definitions and instructions set forth below, together with the instructions, definitions, and rules of construction set forth in the Federal Rules.

INSTRUCTIONS

1. The instructions set forth in Rules 26 and 36 of the Federal Rules of Civil Procedure are incorporated herein by reference.

2. In answering these Requests, you are obligated to comply with Federal Rule of Civil Procedure 36(a). Such obligations include, but are not limited to, furnishing all information, however obtained, including hearsay, which is available to you, and information known by or in possession of you, your agents and attorneys, or appearing in your records. If you cannot answer a Request in full after exercising due diligence to secure the information needed to do so, you must state an answer to the extent possible, specifying your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

3. If any Request is objected to on the grounds of attorney-client privilege or work product, the basis for the objection should be stated in detail, to permit adequate review by the Court.

4. All grounds for objections to a Request or subpart thereof shall be stated with specificity. Any ground not stated in an objection within the time provided by the Federal Rules of Civil Procedure, or any extensions thereof, shall be waived.

5. These Requests shall be deemed to be continuing and it is requested that supplementary answers be served as required by Federal Rule of Civil Procedure 26(e).

6. Your attention is called to Federal Rule of Civil Procedure 37(c)(2), which provides in pertinent part: If a party fails to admit what is requested under Rule 36 and if the requesting party later proves a document to be genuine or the matter true, the requesting party may move that

the party who failed to admit pay the reasonable expenses, including attorneys' fees, incurred in making that proof.

7. These Requests are continuing in nature and should be amended and supplemented in accordance with the Federal Rules of Civil Procedure.

DEFINITIONS

Unless otherwise defined, all words and phrases used herein shall be accorded their usual meaning and shall be interpreted in their common, ordinary sense.

1. The Definitions set forth in Plaintiff Lynne Freeman's Second Amended Request for Production of Documents to Defendants Prospect Agency, LLC, Emily Sylvan Kim, Entangled Publishing, LLC, Tracy Deebs-Elkenaney p/k/a Tracy Wolff and Holtzbrinck Publishers, LLC d/b/a MacMillan, Set One are incorporated herein by reference.

REQUESTS FOR ADMISSION

1. Admit that PROSPECT sent a copy of BMR to Stacy Abrams when she worked at Bloomsbury Publishing, Plc.

2. Admit that the statement in Nancy E. Wolff's February 9, 2022, letter to Mark D. Passin that PELLETIER "created the basic storyline for the Crave book series" is not true.

3. Admit that the statement in Nancy E. Wolff's February 9, 2022, letter to Mark D. Passin to the effect that PELLETIER provided to WOLFF "in writing the main plot, location, characters, and scenes" is not true.

4. Admit that the statement in Nancy E. Wolff's February 9, 2022, letter to Mark D. Passin that "neither Pelletier nor Wolff ever heard of Freeman" was not true even before February 7, 2022.

5. Admit that the statement in Nancy E. Wolff's February 9, 2022, letter to Mark D.

Passin that “[t]he agent, Kim, recalls nothing of this manuscript” was not true on February 7, 2022.

6. Admit that the statement in Nancy E. Wolff’s February 9, 2022, letter to Mark D.

Passin that “Kim, had no creative input on the Crave book manuscripts in any manner” is not true.

7. Admit that Stacy Abrams saw a copy of BMR in 2013.

8. Admit that WOLFF saw a copy of BMR prior to February 7, 2022.

9. Admit that PELLETIER saw a copy of BMR prior to February 7, 2022.

10. Admit that the statement in Nancy E. Wolff’s February 17, 2022, letter to Mark

D. Passin that “Liz Pelletier and Tracy Wolff never had access to your client’s manuscript” was not true on February 17, 2022.

11. Admit that the statement in Nancy E. Wolff’s February 17, 2022, letter to Mark

D. Passin to the effect that WOLFF never received a copy of BMR was not true on February 17, 2022.

12. Admit that KIM wrote a series bible for the CRAVE BOOK SERIES.

13. Admit that KIM suggested Alaska as the setting for the CRAVE BOOK SERIES.

14. Admit that in 2013 in a YA novel WOLFF wrote about the mother of the heroine working as an “corporate lawyer for one of the largest oil companies in the world, and right now she’s in Alaska.”

15. Admit that WOLFF did not mention Alaska in any books prior to *Tempest Unleashed*.

16. Admit that WOLFF mentioned Alaska for the first time in any book in the book *Tempest Unleashed* published June 5, 2012.

17. Admit that WOLFF uses the phrase “[h]is Royal Hotness” for the first time in any book in the book “Royal Pain” published on September 25, 2017.

18. Admit that “[h]is Royal Hotness” became the name of a two-book series written by WOLFF.

19. Admit that WOLFF uses the name Deveraux for the first time in any book in the book *Royal Treatment*.

20. In admit that in Document number WOLFF-0036987 produced by WOLFF in this litigation she uses the phrase “light and dark. Yin and Yang.”

21. Admit that in the CRAVE BOOK SERIES WOLFF does not use the phrase “light and dark. Yin and Yang.”

22. Admit that WOLFF does not use the phrase “light and dark. Yin and Yang” in any of the books that she has written.

23. Admit that WOLFF did not use the phrase "tree stump seats" in any book that she wrote prior to the CRAVE BOOK SERIES.

24. Admit that WOLFF did not use the phrase "my frazzled nerves" in any book that she wrote prior to the CRAVE BOOK SERIES.

25. Admit that WOLFF did not use the phrase "shadow realm" in any book that she wrote prior to the CRAVE BOOK SERIES.

26. Admit that WOLFF did not use the phrase "mother to daughter" in any book that she wrote prior to the CRAVE BOOK SERIES.

27. Admit that WOLFF did not use the phrase "shadow queen" in any book that she wrote prior to the CRAVE BOOK SERIES.

28 Admit that WOLFF did not use the phrase "tiger's eye" in any book that she wrote prior to the CRAVE BOOK SERIES.

29 Admit that WOLFF did not use the word "Stonehenge" in any book that she wrote prior to the CRAVE BOOK SERIES.

30. Admit that WOLFF did not use the phrase "God of Chaos" in any book that she wrote prior to the CRAVE BOOK SERIES.

31. Admit that WOLFF did not use the phrase "vampires, dragons and werewolves, Oh my!" in any book that she wrote prior to the CRAVE BOOK SERIES.

32. Admit that WOLFF did not use the phrase "get (out) of jail free card" in any book that she wrote prior to the CRAVE BOOK SERIES.

33. Admit that WOLFF did not use the phrase "trust no one" in any book that she wrote prior to the CRAVE BOOK SERIES.

34. Admit that WOLFF did not use the word "moose" in any book that she wrote prior to the CRAVE BOOK SERIES.

35. Admit that WOLFF did not use the word "lynx" in any book that she wrote prior to the CRAVE BOOK SERIES.

36. Admit that WOLFF did not use the word "umpteenth" in any book that she wrote prior to the CRAVE BOOK SERIES.

37. Admit that WOLFF did not use the phrase "perch on the gazebo railing" in any book that she wrote prior to the CRAVE BOOK SERIES.

38. Admit that WOLFF did not use the phrase "at the bottom of a ravine" in any book that she wrote prior to the CRAVE BOOK SERIES.

39. Admit that WOLFF did not use the phrase "my heart is pounding out of control and my chest" in any book she wrote prior to the CRAVE BOOK SERIES.

40. Admit that WOLFF did not use the phrase "chunky heels" in any book that she wrote prior to the CRAVE BOOK SERIES.

41. Admit that WOLFF did not use the phrase "Et tu brute? I" in any book that she wrote prior to the CRAVE BOOK SERIES.

42. Admit that WOLFF did not use the phrase "winks. He *winks*" in any book that she wrote prior to the CRAVE BOOK SERIES.

43. Admit that WOLFF did not use the word "fervent" in any book that she wrote prior to the CRAVE BOOK SERIES.

44. Admit that WOLFF did not use the word "Cannibalistic" in any book that she wrote prior to the CRAVE BOOK SERIES.

45. Admit that WOLFF did not use the phrase "Balance in all things" in any book that she wrote prior to the CRAVE BOOK SERIES.

46. Admit that WOLFF did not use the word "counterbalance" in any book that she wrote prior to the CRAVE BOOK SERIES.

47. Admit that WOLFF did not use the phrase "just like that. He snaps his fingers to illustrate" in any book that she wrote prior to the CRAVE BOOK SERIES.

48. Admit that WOLFF did not use the phrase "walk the earth" in any book that she wrote prior to the CRAVE BOOK SERIES.

49. Admit that WOLFF did not use the phrase "beyond ridiculous" in any book that she wrote prior to the CRAVE BOOK SERIES.

50. Admit that WOLFF did not use the phrase "gymnast at the Olympics" in any book that she wrote prior to the CRAVE BOOK SERIES.

51. Admit that WOLFF did not use the word "coagulate" in any book that she wrote prior to the CRAVE BOOK SERIES.

52. Admit that WOLFF did not use the word "ditto" in any book that she wrote prior to the CRAVE BOOK SERIES.

53. Admit that WOLFF did not use the word "runes" in any book that she wrote prior to the CRAVE BOOK SERIES.

54. Admit that WOLFF did not use the phrase "life debt" in any book she wrote prior to the CRAVE BOOK SERIES.

55. Admit that WOLFF did not use the phrase "would know what to do when the time is right" in any book that she wrote prior to the CRAVE BOOK SERIES.

56. Admit that WOLFF did not use the phrase "no longer contain it" in any book that she wrote prior to the CRAVE BOOK SERIES.

57. Admit that WOLFF did not use the phrase "maintain the balance" in any book that she wrote prior to the CRAVE BOOK SERIES.

58. Admit that WOLFF did not use the phrase "am I dead" in any book that she wrote prior to the CRAVE BOOK SERIES.

59. Admit that WOLFF did not use the phrase "well, well, well, looks like" in any book that she wrote prior to the CRAVE BOOK SERIES.

60. Admit that WOLFF did not use the phrase "pang of disappointment" in any book that she wrote prior to the CRAVE BOOK SERIES.

61. Admit that WOLFF did not use the phrase "chaos all around us" in any book that she wrote prior to the CRAVE BOOK SERIES.

62. Admit that WOLFF did not use the phrase "what kind of effect he's having on me" in any book that she wrote prior to the CRAVE BOOK SERIES.

63. Admit that WOLFF did not use the phrase "I promise I'm going to hold you to that" in any book that she wrote prior to the CRAVE BOOK SERIES.

64. Admit that WOLFF did not use the phrase "beyond ridiculous" in any book that she wrote prior to the CRAVE BOOK SERIES.

65. Admit that WOLFF did not use the phrase "Olympic gymnastic routine" in any book that she wrote prior to the CRAVE BOOK SERIES.

66. Admit that WOLFF did not use the word "coagulate" in any book that she wrote prior to the CRAVE BOOK SERIES.

67. Admit that WOLFF did not use the phrase "ditto" in any book that she wrote prior to the CRAVE BOOK SERIES.

68. Admit that WOLFF did not use the phrase "sun -dappled" in any book that she wrote prior to the CRAVE BOOK SERIES.

69. Admit that WOLFF did not use the phrase "Aurora Borealias" in any book she wrote prior to the CRAVE BOOK SERIES.

70. Admit that WOLFF did not use the word "antechamber" in any book that she wrote prior to the CRAVE BOOK SERIES.

71. Admit that WOLFF did not use the word "Bloodletter" in any book that she wrote prior to the CRAVE BOOK SERIES.

72. Admit that WOLFF did not use the word "windigo" in any book that she wrote prior to the CRAVE BOOK SERIES.

73. Admit that WOLFF did not use the phrase "mock bow" in any book that she wrote prior to the CRAVE BOOK SERIES.

74. Admit that WOLFF did not use the word "Abomination" in any book that she wrote prior to the CRAVE BOOK SERIES.

75. Admit that WOLFF did not use the phrase "homicidal maniac" in any book that she wrote prior to the CRAVE BOOK SERIES.

76. Admit that WOLFF did not use the phrase "woodsy scent" in any book that she wrote prior to the CRAVE BOOK SERIES.

77. Admit that WOLFF did not use the word "Sumerian" in any book that she wrote prior to the CRAVE BOOK SERIES.

78. Admit that WOLFF did not use the phrase "witch trials" in any book that she

wrote prior to the CRAVE BOOK SERIES.

79. Admit that WOLFF did not use the word "Caribou" in any book that she wrote prior to the CRAVE BOOK SERIES.

80. Admit that WOLFF did not use the word "Denali" in any book that she wrote prior to the CRAVE BOOK SERIES.

81. Admit that WOLFF did not use the phrase "and I don't believe in coincidences" in any book that she wrote prior to the CRAVE BOOK SERIES.

82. Admit that WOLFF did not use the phrase "one chance" in any book that she wrote prior to the CRAVE BOOK SERIES.

83. Admit that WOLFF did not use the word "Morrigan" in any book that she wrote prior to the CRAVE BOOK SERIES.

84. Admit that WOLFF did not use the phrase "Edward" from the book *Twilight* in any book she wrote prior to the CRAVE BOOK SERIES.

85. Admit that WOLFF did not use the phrase "the Chosen One" in any book that she wrote prior to the CRAVE BOOK SERIES.

86. Admit that WOLFF did not use the phrase "Alaska feels like the moon" in any book that she wrote prior to the CRAVE BOOK SERIES.

87. Admit that WOLFF did not use the phrase "soul sucking demon" in any book that she wrote prior to t Admit that WOLFF did not use the phrase "Frankenstein" in any book that she wrote prior to the CRAVE BOOK SERIES.

88. Admit that WOLFF did not use the phrase "molten amber eyes" in any book that she wrote prior to the CRAVE BOOK SERIES.

89. Admit that WOLFF did not use the phrase "velvet wingback chair" in any book that she wrote prior to the CRAVE BOOK SERIES.

90. Admit that WOLFF did not use the phrase "snow white" in any book that she

wrote prior to the CRAVE BOOK SERIES.

91. Admit that WOLFF did not use the phrase "down filled hooded parkas" in any book that she wrote prior to the CRAVE BOOK SERIES.

92. Admit that WOLFF did not use the phrase "whole lot of trouble" in any book that she wrote prior to the CRAVE BOOK SERIES.

93. Admit that WOLFF did not use the phrase "whole lot of something" in any book that she wrote prior to the CRAVE BOOK SERIES.

94. Admit that WOLFF did not use the phrase "add fuel to the fire" in any book that she wrote in the CRAVE BOOK SERIES.

95. Admit that WOLFF did not use the phrase "uncharacteristic behavior" in any book that she wrote prior to the CRAVE BOOK SERIES.

96. Admit that WOLFF did not use the phrase "stone slab" in any book that she wrote prior to the CRAVE BOOK SERIES.

97. Admit that WOLFF did not use the phrase "ornately carved set of double doors" in any book that she wrote prior to the CRAVE BOOK SERIES.

98. Admit that WOLFF did not use the phrase "I'd be lying if I said that it didn't" in any book that she wrote prior to the CRAVE BOOK SERIES.

99. Admit that WOLFF did not use the phrase "I promise I'm to hold you to that" in any book that she wrote prior to the CRAVE BOOK SERIES.

100. Admit that WOLFF did not use the phrase "primal kind of war cry" in any book that she wrote prior to the CRAVE BOOK SERIES.

101. Admit that WOLFF did not use the phrase "clickety clack" in any book that she wrote prior to the CRAVE BOOK SERIES.

102. Admit that WOLFF did not use the word "the order" in any book that she wrote prior to the CRAVE BOOK SERIES.

Dated: November 15, 2022

CSReeder, P.C.
Attorneys for Plaintiff

By: 

Mark D. Passin
11766 Wilshire Blvd., Suite 1470
Los Angeles, CA 90025
Telephone: (310) 861-2470
Email: mark@csrlawyers.com

Reitler Kailas & Rosenblatt LLC
Paul LiCalsi
885 Third Avenue, 20th Floor
New York, New York 10022
Main: 212-209-3050
Email: plicalsi@reiterlaw.com

PROOF OF SERVICE

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On November 15, 2022 I served the foregoing document described as **PLAINTIFFS'S LYNNE FREEMAN'S FIRST SET OF REQUESTS TO ADMIT TO DEFENDANTS TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF AND ENTANGLED PUBLISHING, LLC** on the parties in this action listed below as follows:

Nancy Wolff nwolff@cdas.com CeCe Cole ccole@cdas.com Benjamin Halperin BHalperin@cdas.com Cowan, DeBaets, Abrahams & Sheppard LLP Dwayne Goetzel dgoetzel@intprop.com Kowert, Hood, Munyon, Rankin & Goetzel	<i>Attorneys for Defendants,</i> TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC
Lacy Herman Koonce, III lance.koonce@klarislaw.com Zachary M. Press zpress@mkslex.com Klaris Law	<i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC

☐ **BY MAIL:** By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

☐ **BY OVER NIGHT DELIVERY, VIA FED-EX:** I gave the document(s) to our overnight courier service for delivery to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE:** I gave said documents to the firm's regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE (*Ex Parte*):** I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of _____, in Department ____ of the _____ Courthouse, _____, California.

☒ **BY ELECTRONIC MAIL:** I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.

☐ **BY FACSIMILE:** I faxed said document(s) to the addressee, at the specified fax numbers shown above.

☐ **COURTESY COPY BY ELECTRONIC MAIL:** I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 15, 2022, at Los Angeles, California.



Mark D. Passin

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LYNNE FREEMAN, an individual,

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, an individual, EMILY SYLVAN KIM, an individual, PROSPECT AGENCY, LLC, a New Jersey limited liability company, ENTANGLED PUBLISHING, LLC, a Delaware limited liability company, HOLTZBRINCK PUBLISHERS, LLC D/B/A MACMILLAN, a New York limited liability company, UNIVERSAL CITY STUDIOS, LLC, a Delaware limited liability company, and CRAZY MAPLE STUDIO, INC., a California Corporation,

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3. Admit that the statement in Nancy E. Wolff's February 9, 2022, letter to Mark D. Passin to the effect that PELLETIER provided to WOLFF "in writing the main plot, location, characters, and scenes" is not true.

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2022.

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7. Admit that Stacy Abrams saw a copy of BMR in 2013.

8. Admit that WOLFF saw a copy of BMR prior to February 7, 2022.

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11. Admit that the statement in Nancy E. Wolff's February 17, 2022, letter to Mark D. Passin to the effect that WOLFF never received a copy of BMR was not true on February 17, 2022.

12. Admit that KIM created a series bible for the CRAVE BOOK SERIES.

13. Admit that KIM created chapter profiles for the CRAVE BOOK SERIES.

14. Admit that KIM created chapter titles for the CRAVE BOOK SERIES.

15. Admit that KIM suggested Alaska as the setting for the CRAVE BOOK SERIES.

16. Admit that KIM stated in an e-mail to FREEMAN words to the effect that someone at PROSPECT sent BMR to Walker Books or Bloomsbury Publishing in 2017.

17. Admit that PELLETIER

18. Admit that KIM did not send BMR to Jhanteigh Kupihea during the time she represented FREEMAN.

19. Admit that Freeman's manuscript BMR is a paranormal romance in which an ancient prophecy, cursed objects, supernatural beings and strong themes of Celtic and Egyptian mythology are set against the backdrop of Alaska.

20. Admit that KIM sold the book *Soulbound* written by Tessa Adam a/k/a Tracy

Deebs to Jhanteigh Kupihea in 2012.

21. Admit that KIM was active in editing the CRAVE BOOK SERIES.
22. Admit that PELLETIER received 5 pitch ideas via e-mail from WOLFF on April 26, 2019.
23. Admit that PELLETIER has moved to Austin, Texas.
24. Admit that PELLETIER spent 2-3 weeks in a hotel with WOLFF doing edits to *Court* prior to the release of *Court*.
25. Admit that the phrase “tree stump seats” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.
26. Admit that the phrase “my frazzled nerves” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.
27. Admit that the phrase “shadow realm” is in one or more of the versions of BMR sent to KIM BY FREEMAN during the period of time that she represented FREEMAN.
28. Admit that the phrase “mother to daughter” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.
29. Admit that the phrase “queen of shadows” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.
30. Admit that the phrase “clickety clack” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.
31. Admit that the phrase “tiger eyes” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.
32. Admit that the word “Stonehenge” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.
33. Admit that the phrase “God of Chaos” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.
34. Admit that the phrase “vampires, trolls and demons, Oh my!” is in one or more of

the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

35. Admit that the phrase “get (out) of jail free card” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

36. Admit that the phrase “trust no one” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

37. Admit that the word “moose” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

38. Admit that the word “lynx” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

39. Admit that the word “umpteenth” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

40. Admit that the phrase “perched on the railing” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

41. Admit that the phrase “at the bottom of a ravine’ is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

42. Admit that the phrase “my heart is pounding out of control and my chest” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

43. Admit that the phrase “chunky heels” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

44. Admit that the phrase “Et tu brute?I” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

45. Admit that the word “pirouetted” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

46. Admit that the phrase “wink, *Winks*” is in one or more of the versions of BMR

sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

47. Admit that the word “fervent” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

48. Admit that the word “cannibals” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

49. Admit that the phrase “balance in all things” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

50. Admit that the word “counterbalance” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

51. Admit that the phrase “my friends hobble across the room moving in unison like a chain of pull-string ducks toys” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

52. Admit that the phrase “walk the earth” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

53. Admit that the phrase “beyond ridiculous” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

54. Admit that the phrase “Olympic gymnastic routine” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

55. Admit that the word “coagulate” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

56. Admit that the word “ditto” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

57. Admit that the word “runes” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

58. Admit that the phrase “life debt” is in one or more versions of BMR sent to KIM

by FREEMAN during the period of time that she represented FREEMAN.

59. Admit that the phrase “no longer contain it” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

60. Admit that the phrase “maintain the balance” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

61. Admit that the phrase “minion of Satan” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

62. Admit that the phrase “am I dead” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

63. Admit that the phrase “well, well, well, looks like” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

64. Admit that the phrase “pang of disappointment” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

65. Admit that the phrase “chaos erupts all around” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

66. Admit that the phrase “he knows exactly what effect he has on me” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

67. Admit that the phrase “I promise I’m going to hold you to that” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

68. Admit that the phrase “sunlight dappling” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

69. Admit that the word “antechamber” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

70. Admit that the word “Bloodletter” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

71. Admit that the word “wendigo” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

72. Admit that the phrase “the order” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

73. Admit that the phrase “mock bow” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

74. Admit that the word “abomination” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

75. Admit that the phrase “homicidal maniac” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

76. Admit that the phrase “woodsy scent” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

77. Admit that the word “Sumerian” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

78. Admit that the phrase “which trials” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

79. Admit that the word “caribou” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

80. Admit that the word “Denali” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

81. Admit that the phrase “and I don’t believe in coincidences” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

82. Admit that the phrase “one chance” is in one or more of the versions of BMR sent

to KIM by FREEMAN during the period of time that she represented FREEMAN.

83. Admit that the word “Morrigan” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

84. Admit that the phrase “twilight book” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

85. Admit that the phrase “the Chosen One” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

86. Admit that the phrase “winer in Alaska must be like living on the moon” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

87. Admit that the phrase “soul sucking demon” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

88. Admit that the word “Frankenstein” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

89. Admit that the phrase “eyes were molten amber” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

90. Admit that the phrase “alien theory” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

91. Admit that the phrase “velvet wing chair” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

92. Admit that the phrase “snow white” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

93. Admit that the phrase “down parkas” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

94. Admit that the phrase “whole lot of trouble” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

95. Admit that the phrase “whole lot of something” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

96. Admit that the phrase “adding fuel to the fire” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

97. Admit that the phrase “uncharacteristic behavior” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

98. Admit that the phrase “stone slab” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

99. Admit that the phrase “ornately carved double doors” is in one or more of the versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

100. Admit that the phrase “I’d be lying if I said that it didn’t” is in one or more versions of BMR sent to KIM by FREEMAN during the period of time that she represented FREEMAN.

101. Admit that the phrases and words below were edited out of BMR during KIM’s representation of FREEMAN and are in various of the books in the CRAVE BOOK SERIES.

don’t want you to be uncomfortable

slight smile on her lips

a figment of my imagination.

a king cobra moving in for the strike.

a long, slow breath

a low whistle

a pair of jeans and a sleek black turtle neck

a primal war cry

a rabid dog

a thoughtful look

absolutely no hesitation,

admiring her handiwork.

After everything that happened

against the demon. But

all of the pieces to the puzzle

and lock them in a box.

Are you kidding me?

as a man with a wolf's head,

as our eyes meet. I

at the bottom of a ravine

been my mantra

big bad wolf

black leggings with

ceremonial dagger

Change is coming. I

chaos erupted all around us.

Come on. Don't be mad.

common sense kicked in

compact shut and

confused and more than a little

could not have been more surprised.

dagger with both hands,

did I miss something?"

doing the right thing

don't know what you're asking

draped a scarf around my neck

Et tu, Brute? I

For one wild moment

forest of trees

Gaelic

gemstones gleaming

golden chalice

Good and evil. But

had no way of knowing

handle the truth.

have a lot in common,

He blew out a long breath

He leans over and whispers in my ear

He tapped his fingers on the table

He was everything I could *have hoped* for in a *mate*.

he was friendly when I saw him

his neck, and I breathe him in.

horrified fascination as

howling at the moon

I balled my hands into fists and

I breathed a sigh of relief when

I don't know what I would do

I don't know what you mean," I

I don't know what's going on with

I looked back and forth between them,

I lost track of time.

I rolled my eyes and swallowed the urge to tell her

I stuck my tongue out at him.

I swallowed. Hard. “

I take a deep breath and let it out

I took a deep breath and let it out

I’d be lying if I said that it didn’t

in Dante’s Inferno

innocuous enough.

knocks me off balance.

lent an air of

Let’s make a deal.

like a beacon

like a king cobra

like Superman

lynx,

Mean Girls,

meant something else entirely.

more than enough time

more than enough time to get

more to you than meets the eye,

Mother Nature

my body to his.

my complete humiliation

My eyes bugged out of my head

my face in his hands.

my favorite color.

my frazzled nerves.

My hands were trembling so badly that I

None of this feels right.

Not to mention the fact that I

Not yet. Not when

of a dragon

of a hummingbird's

of-jail-free card.

old-fashioned pocket watch

once and for all. Thinking about

open the door and let me

ornately carved double doors

out a long, slow breath, but

outside for a minute or two?"

owes you a debt,

pang of disappointment

part lion, part human

peacocks.

perched on the railing

perfect seventy degrees

plain and simple

plant a seed

poised to strike

polar bears

Prada

razor-sharp claws

refused to meet my eyes.

rummaging through

Saving Grace

She reached out and grabbed my hand,

shock, just static electricity

should be here any minute

since the beginning of time

smile faltered. For a moment,

something I want to talk to you about.

something inside was urging me.

Something is going to happen to me

soul sucking demon

spoilsport.

spreading across his face

Star Wars”

stink of charred flesh filling the air

such a drama queen.

the carrot dangled before my nose

the hair on the back of my neck

the puzzle pieces

the pyramids—

the solid strength of him

there is just no reasonable explanation.

There’s something I want to talk to you about

there's no reasonable explanation

things that go bump in the night. I

tilted my chin up with his fingers,
to know the answer to that question
Tom Cruise
Trust no one.”
Unfreakingbelievable!
velvet wing chair
weight on my chest,
What a joke
What could possibly go wrong¹
What’s going to happen to hi
who shrugged uncomfortably
Whoa, now
With a sickening crunch
with unshed tears. “
wondering what on earth
You have not heeded my warnings,
favorite ice cream
fear and adrenaline
fear was a living, breathing
He groans low in his throat,
history is always told from the vantage point of the victor.
I don't know how to explain
I stifled the urge to scream.
I'd lost track of the time.
I've said something funny. “
kisses on my forehead,

lit candles. And the
my knees up under my chin
my vantage point
nailing the coffin
part of me that was absolutely terrified
scream that rises in my throat. “
tell you to stay away from him
the effect he was having on me

Dated: November 15, 2022

CSReeder, P.C.
Attorneys for Plaintiff

By:



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PROOF OF SERVICE

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On November 15, 2022 I served the foregoing document described as **PLAINTIFFS'S LYNNE FREEMAN'S FIRST SET OF REQUESTS TO ADMIT TO DEFENDANTS PROSPECT AGENCY, LLC AND EMILY SYLVAN KIM** on the parties in this action listed below as follows:

Nancy Wolff nwolff@cdas.com CeCe Cole ccole@cdas.com BHalperin@cdas.com Benjamin Halperin BHalperin@cdas.com Cowan, DeBaets, Abrahams & Sheppard LLP Dwayne Goetzel dgoetzel@intprop.com Kowert, Hood, Munyon, Rankin & Goetzel	<i>Attorneys for Defendants,</i> TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC
Lacy Herman Koonce, III lance.koonce@klarislaw.com Zachary M. Press zpress@mkslex.com Klaris Law	<i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC

☐ **BY MAIL:** By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

☐ **BY OVER NIGHT DELIVERY, VIA FED-EX:** I gave the document(s) to our overnight courier service for delivery to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE:** I gave said documents to the firm's regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE (Ex Parte):** I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of _____, in Department ____ of the _____ Courthouse, _____, California.

☒ **BY ELECTRONIC MAIL:** I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.

☐ **BY FACSIMILE:** I faxed said document(s) to the addressee, at the specified fax numbers shown above.

☐ **COURTESY COPY BY ELECTRONIC MAIL:** I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 15, 2022, at Los Angeles, California.

A handwritten signature in blue ink, consisting of a large, stylized loop followed by a series of smaller, connected strokes.

Mark D. Passin